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Attorneys for Defendants
J.P. MORGAN SECURITIES INC.,
BEAR STEARNS ASSET BACKED SECURITIES I LLC,
CHASE MORTGAGE FINANCE CORPORATION I,
J.P. MORGAN ACCEPTANCE CORPORATION I, and
JPMORGAN SECURITIES HOLDINGS LLC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

1 J.P. MORGAN ACCEPTANCE)
2 CORPORATION I; JPMORGAN)
3 SECURITIES HOLDINGS LLC; AND,)
4 DOES 1-50,)
Defendants.)

5

6 WHEREAS, on September 2, 2010, Plaintiff filed an action in the Superior Court of
7 California, San Francisco against Defendants, captioned *The Charles Schwab Corporation v. J.P.*
8 *Morgan Securities Inc., et al.*, Case No CGC-10-503206 (the "State Action");

9 WHEREAS, on October 6, 2010, Defendants removed the State Action from the Superior
10 Court of California, San Francisco to the Northern District of California;

11 WHEREAS, on October 12, 2010, Plaintiff and Defendants stipulated to extend the date
12 by which Defendants must answer, move, or otherwise respond to the Complaint to January 7, 2011;

13 WHEREAS, on October 28, 2010, Plaintiff filed its Motion to Remand;

14 WHEREAS, on December 2, 2010, the Court entered the Parties' Stipulation and
15 Proposed Order In Support of Administrative Motion Concerning Hearing and Briefing Schedule for
16 Motion to Remand, which, in part, set the hearing date for Plaintiff's Motion to Remand for March 25,
17 2011;

18 WHEREAS, a Case Management Conference is scheduled for April 15, 2011;

19 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG THE
20 PARTIES HERETO AND THEIR COUNSEL OF RECORD THAT, SUBJECT TO THE APPROVAL
21 OF THE COURT:

- 22 (1) Defendants shall answer, move, or otherwise respond to the Complaint within
23 twenty-one (21) days from the date that the Court enters its order granting or
24 denying Plaintiff's Motion to Remand;
25 (2) By entering into this Stipulation, Defendants do not waive their right to seek
26 adjournment or additional time from the Court in which to answer, move, or
27 otherwise respond to the Complaint;

(3) By entering into this Stipulation, the Parties do not waive, and expressly preserve, any and all rights, claims, defenses, including all defenses relating to jurisdiction, venue, and arbitrability.

Respectfully submitted,

Dated: December 17, 2010

Dated: December 17, 2010

/s/ Anne Hartman

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Corporation I, and JPMorgan Securities
Holdings LLC.*

* * * *

NOW, THEREFORE, PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 17, 2010


The Honorable Jeffrey S. White
United States District Court Judge

1 I, Jason de Bretteville, am the ECF User whose ID and password are being used to file
2 this Stipulation And [Proposed] Order To Extend Time To Respond To The Complaint. In compliance
3 with General Order 45, X.B., I hereby attest that Anne Hartman has concurred in this filing.
4

5 Dated: December 17, 2010

/s/ Jason de Bretteville

Jason de Bretteville

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